



South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

FAXED: APRIL 5, 2007

April 5, 2007

Mr. Craig A. Ewing
City of Palm Springs
Planning Department
3200 East Tahquitz Canyon Way
Palm Springs, CA 92262

Dear Mr. Ewing:

**Draft Environmental Impact Statement/Report (DEIS/R)
For the Mountain View IV Wind Energy Project
(February 2007)**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated in the Final Environmental Impact Statement/Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Statement/Report. The SCAQMD would be available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith, Ph.D.,
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

SS: CB

RVC070220-05
Control Number

**Draft Environmental Impact Statement/Report for the
Mountain View IV Wind Energy Project
(February 2007)**

1. Project Construction Emissions

The lead agency states on page 4.0-2 of the DEIS/R that “The proposed project is not expected to significantly affect air quality as defined by the Air Quality Element of the City’s General Plan, and is not expected to exceed threshold criteria of the South Coast Air Quality Management District Air Quality Handbook, 1993.” The lead agency, however, does not provide any quantitative data from which such conclusions are derived.

The proposed project involves the transportation and assembling of components of approximately 58 wind turbine generators. It also involves the hoisting of the turbines into place by cranes, the construction of an electrical substation and of new gravel roads and gravel pads around the turbines, and the movement of over 2,000 cubic yards of soil on project site. These project components are detailed on pages 2.0-18 and 2.0-19 of the DEIS/R. Although all these activities involve the use of heavy construction equipment and heavy-duty diesel trucks which emit pollutants, the lead agency provides no data regarding emissions from these construction activities. There is also no data on emissions from worker vehicle trips that would be involved in the construction of the proposed facility.

Without quantifying air quality impacts from the proposed project, the lead agency has not demonstrated that the proposed project’s air quality impacts are not significant. To calculate potential adverse air quality impacts from the proposed project, the SCAQMD recommends that the lead agency use the emission calculation methodologies from the SCAQMD 1993 Handbook or other publicly available air quality calculation methodologies. Appropriate emission factors for on-road mobile sources can be obtained from CARB’s EMFAC 2007 model. For off-road mobile sources CARB’s OFFROAD 2007 model should be used. Alternatively, on-road and off-road mobile source emission factors from the SCAQMD website can be used. These factors can be found at the following web site: www.aqmd.gov/ceqa/handbook.

2. Dust Control Plan

The lead agency also states on page 4.0-2 of the DEIS/R that “Construction and operation of the project would not result in a significant dust or blowsand source due to applied mitigation, including implementation of the project’s Dust Control Plan.” The lead agency lists two measures, namely, the application of 4” to 6” of gravel cover compacted native material on internal access roads and 20 mph speed limits within the project boundaries, to reduce dust emissions. The lead agency does not provide a comprehensive list of the proposed dust mitigation measures in the Dust Control Plan nor their control efficiencies that, at a minimum will be necessary to comply with SCAQMD Rules 403-Fugitive Dust. In the absence of this information and the lack of data on project emissions noted

above, SCAQMD staff is unable to confirm the lead agency's conclusion that the project emissions would be reduced to less than significance.